

UNITED BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE:

Humberto Bonelly Labrada

Debtor

CASE NO. 21-10224-TMD

CHAPTER 7

**MOTION TO CONVERT CASE TO CHAPTER 13**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE OF SAID COURT:

**This pleading requests relief that may be adverse to your interests.**

**If no timely response is filed within 21 days from the date of service, the relief requested herein may be granted without a hearing being held.**

**A timely filed response is necessary for a hearing to be held.**

Humberto Bonelly Labrada, Debtor, files this Motion to Convert to Chapter 13 and respectfully show this Court the following:

1. The Debtor filed a voluntary petition under Chapter 7 of the Bankruptcy Code on March 30, 2021. A trustee was appointed and a meeting of creditors was held on May 6, 2021 with reset meetings on May 27, 2021, June 17, 2021, and July 8, 2021. No prior conversion has been entered in this case pursuant to sections 706 or 1112 or 1207 of the Bankruptcy Code.
2. Debtor agreed to and signed a Waiver of Discharge on July 19, 2021 (Doc#34). Debtor wishes to convert this case to a Chapter 13 and pay all claims 100%.
3. The Debtor is eligible under section 109 of the Bankruptcy code to be Debtor under Chapter 13.

WHEREFORE, the Debtor respectfully requests that this case be converted to a Chapter 13.

Respectfully submitted,

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By: /s/Michael Baumer  
Michael Baumer -01931920  
Megan Baumer-01931915

**CERTIFICATE OF SERVICE**

I, the above signed, do hereby certify that a true and correct copy of the foregoing document was served via first class mail (unless otherwise indicated below) to the following parties in interest:

Amex  
P.o. Box 981537  
El Paso, TX 79998

Discover  
Pob 15316  
Wilmington, DE 19850

Portfolio Recov Assoc  
120 Corporate Blvd Ste 100  
Norfolk, VA 23502

Barclays Bank Delaware  
P.o. Box 8803  
Wilmington, DE 19899

East Harbor Financial  
12360 NW South River Drive Ste B  
Miami, FL 33178

Reliant Towing  
1000 Slaughter Creek Dr  
Austin, Tx 78748

Becket & Lee, LLP  
PO Box 3002  
Malvern, PA 19355-0702

Financial Pacific Leasing  
3455 S 344th Way STE 300  
Federal Way, WA 98001

San Paloma Apartments  
12501 Tech Ridge Blvd  
Austin, TX 78753

Capital One Bank  
Po Box 31293  
Salt Lake City, UT 84131

Freedom Trucking  
12221 Merit Drive  
Dallas, TX 75251

Synchrony Bank  
Att: Bankruptcy Department  
PO Box 965060  
Orlando, FL 32896-5060

Cavalry Portfolio Serv  
500 Summit Lake Drive  
Valhalla, NY 10595

Humberto Bonelly Labrada  
12501 Tech Ridge Blvd, #221  
Austin, TX 78753

Transport Funding  
8717 W 110th St #700  
Overland Park, KS 66210

Chase  
Po Box 15369  
Wilmington, DE 19850

Ironwood Finance, Inc  
800 North Shoreline Blvd \$1500s  
Corpus Christ, Tx 78401

University Federal Credit Union  
Po Box 9350  
Austin, TX 78766

Citi  
Po Box 6217  
Sioux Falls, SD 57117

Merrick Bank Corp  
Po Box 9201  
Old Bethpage, NY 11804

Conn Appliances Inc  
Box 2358  
Beaumont, TX 77704

Midland Credit Management  
320 East Big Beaver  
Troy, MI 48083

and via electronic notice to the following registered CMECF users:

US Trustee  
903 San Jacinto  
Austin, TX 78701

Hayward PLLC  
Jamie Kirk & Mark Newton  
10501 N. Central Expressway #106  
Dallas, TX 75231

Ron Satija, Trustee  
PO Box 660208  
Austin, TX 78766

Christopher V. Arisco  
PADFIELD & STOUT, L.L.P.  
420 Throckmorton Street, Suite 1210  
Fort Worth, Texas 76102

Dated: August 18, 2021